

EXHIBIT K

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. Islamic Republic of Iran, No. 15-cv-9903 (GBD)(SN)

DECLARATION OF WILLIAM G. DIETRICH

I, WILLIAM G. DIETRICH, hereby declare under penalty of perjury:

1. I am currently 68 years of age and reside in Peapack, New Jersey
2. I was the fiancée of Karen Lynn Seymour who was killed in the September 11, 2001 terrorist attacks at the World Trade Center in New York where she was working for the ETC division of Garban Intercapital.
3. At the time of her death, Karen L. Seymour and I had been living together as husband and wife for approximately eleven years.
4. At the time of her death, Karen L. Seymour and I were living with our two children in the home that we purchased together for our family. (See attached Deed dated January 26, 2000).
5. Prior to her death, Karen L. Seymour and I had agreed to be married to each other.
6. At the time of her death on September 11, 2001, Karen L. Seymour was wearing an engagement ring and a wedding band that I had given her.
7. Karen L. Seymour and I had two children together.
8. During our life together, Karen L. Seymour and I comingled all our assets, including our bank savings account. (See attached Millington Savings Bank Account Summary).
9. On September 11, 2001, Karen L. Seymour died intestate. I was issued Letters of Administration authorizing me to administer her estate. (See attached Letters of Administration.)

10. At the time of her death, Karen L. Seymour and I were very much in love and intended to spend the rest of our lives together raising our children and growing old together.

11. At the time of her death, Karen L. Seymour and I depended on each other for financial, spiritual and emotional support.

12. The September 11, 2001 terrorist attacks destroyed the life that Karen Seymour and I had built together, and my life will never be the same after losing her.

13. At the time of her death, Karen Seymour was my spouse in all ways except in name.

I declare under penalty of perjury the foregoing is true and correct.

Date: _____

8/1/2019


William G. Dietrich



008318

ORIGINAL

RECEIVED

DEED - BARGAIN AND SALE (Covenant as to Grantor's Act) IND. TO IND. OR CORP. - Plain Language

2000 JAN 31 P 2:39

DEEDJOAN BRAMHALL
MORRIS CO. CLERK

This Deed is made on January 26, 2000

BETWEEN

JOSEPH W. TIMKO, TRUSTEE UNDER A TRUST AGREEMENT DATED JANUARY, 1994, whose address is 13 Dogwood Terrace, Millington New Jersey 07946, referred to as the GRANTOR,

AND

WILLIAM G. DIETRICH AND KAREN L. SEYMOUR, NOT MARRIED TO EACH OTHER, whose address is about to be 13 Dogwood Terrace, Millington New Jersey 07946, referred to as the GRANTEE.

The words "Grantor" and "Grantee" shall mean all Grantors and all Grantees listed above.

TRANSFER OF OWNERSHIP. The Grantor grants and conveys (transfers ownership of) the property described below to the Grantee. This transfer is made for the sum of **Six Hundred Fifty Thousand Dollars and No Cents (\$650,000.00)**. The Grantor acknowledges receipt of this money.

TAX MAP REFERENCE. (N.J.S.A. 46:15-2.1) Municipality of Township of Long Hill.

Block No. 134

Lot No. 18

PROPERTY. The property consists of the land and all the buildings and structures on the land in Township of Long Hill, County of Morris and State of New Jersey. The legal description is:

SEE SCHEDULE A ATTACHED HERETO AND MADE A PART HEREOF.

STREET ADDRESS RECITAL. Being commonly designated as 13 Dogwood Terrace, Millington New Jersey 07946.

PREPARED BY:


DOUGLAS M. D'ALESSANDRO, ESQ.

COUNTY OF MORRIS	
Consideration	650,000
Base Tax	2,275.00
Additional Tax	750.00
REALTY TRANSFER FEE	3,025.00
Date	1-31-00
By	SK
RECORDING FEE	2200

DB5128 P259

FIDELITY NATIONAL TITLE INSURANCE COMPANY

SCHEDULE A

ITEM 4

DESCRIPTION

LA 16,294

Situate in the Township of Long Hill, County of Morris and the State of New Jersey.

Being known and designated as Lot 18 in Block 134 as shown and laid out on a certain map entitled "Map of Skyline Ridge at Millington, Section 3, situated in Passaic Township, Morris County, New Jersey" which map was filed in the Morris County Clerk's Office on January 12, 1972 as Map No. 3190.

For Information Only: Being known as Lot 18 Block 134 on the Official Tax Map of the Township of Long Hill and commonly called 13 Dogwood Terrace.

DB5128 P260

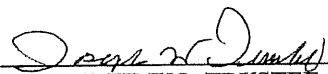
TITLE RECITAL. Being the same premises conveyed to the Grantor herein by Deed of Joseph W. Timko, married, dated January 21, 1994 and recorded in the Morris County Clerk's Office on February 14, 1994 in Deed Book 3922 at Page 180; the same premises having been conveyed to Joseph W. Timko, married by Deed of Joseph W. Timko and Ellen L. Timko, his wife, dated January 21, 1994 and recorded in the office of the Morris County Clerk in Deed Book 3922 at Page 177; the same premises having been conveyed to Joseph W. Timko and Ellen L. Timko, his wife by Deed of Sky Line Ridge, Inc. dated July 3, 1973 and recorded July 9, 1973 in the office of the Morris County Clerk in Deed Book 2259 at page 404.,

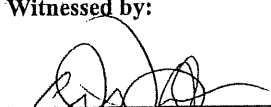
EASEMENTS AND RESTRICTIONS. This conveyance is made subject to easements and restrictions of record, if any, such statement of facts as an accurate survey may disclose and to applicable zoning ordinances.

PROMISES BY GRANTORS. The Grantor promises that the Grantor has done no act to encumber this property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46:4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal rights which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

SIGNATURES. The Grantor signs this Deed as of the date at the top of the first page.

Witnessed by:


JOSEPH W. TIMKO, TRUSTEE


DOUGLAS M. D'ALESSANDRO
Attorney at Law of New Jersey

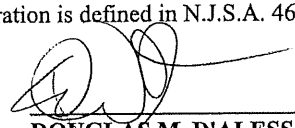
STATE OF NEW JERSEY, COUNTY OF SOMERSET

SS.:

I CERTIFY that on **January 26, 2000**
JOSEPH W. TIMKO, TRUSTEE

personally came before me and acknowledged under oath, to my satisfaction, that this person (or if more than one, each person):

- a) are named in and personally signed this Deed;
- b) signed, sealed and delivered this Deed as his or her act and deed; and
- c) made this Deed for **\$650,000.00** as the full and actual consideration paid or to be paid for the transfer of title. (Such consideration is defined in N.J.S.A. 46:15-5.)


DOUGLAS M. D'ALESSANDRO
Attorney at Law of New Jersey

DEED

DATED: January 26, 2000

JOSEPH W. TIMKO, TRUSTEE UNDER A
TRUST AGREEMENT DATED
JANUARY, 1994, GRANTOR

RECORD AND RETURN TO:

CHARLES A. STRENK, ESQ.
KIERNAN & STRENK, ESQS.
13 PINE STREET
P.O. BOX 1127
MORRISTOWN, NJ 07962

TO

WILLIAM G. DIETRICH AND KAREN L.
SEYMOUR, NOT MARRIED TO EACH
OTHER, GRANTEE

MILLINGTON SAVINGS BANK
1902 LONG HILL ROAD
MILLINGTON, N.J. 07946

ACCOUNT SUMMARY

2035 001

WILLIAM DIETRICH
KAREN SEYMOUR

PAGE 1 of 2
STATEMENT PERIOD
FROM 10/16/00
THRU 11/15/00

ENCLOSURES 16

NEW CHECKING

ACCOUNT NBR DD		BEGINNING BALANCE	\$3,926.77
AVG BALANCE	\$4,532.66	DEPOSITS/CREDITS	\$14,000.00
TAX ID NUMBER		INTEREST PAID	\$7.30
YTD INTEREST	\$385.47	CHECKS/DEBITS	\$17,820.33-
YTD WITHHOLDING	\$0.00	SERVICE CHARGES	\$0.00
		ENDING BALANCE	\$113.74
		# DEPOSITS/CREDITS	3
		# CHECKS/DEBITS	16

DATE	DESCRIPTION	AMOUNT	BALANCE
10/16	BEGINNING BALANCE		\$3,926.77
10/20	CK# 152	49.99-	3,876.78
10/21	DEPOSIT-CASH	8,000.00	11,876.78
10/21	CK# 165	2,524.00-	9,352.78
10/24	CK# 162	90.00-	9,262.78
10/24	CK# 164	90.00-	9,172.78
10/25	CK# 163	1,500.00-	7,672.78
10/30	DEPOSIT-CASH	6,000.00	13,672.78
10/30	CK# 167	500.00-	13,172.78
10/30	CK# 169	1,380.00-	11,792.78
11/01	CK# 166	3,177.60-	8,615.18
11/01	CK# 171	4,000.67-	4,614.51
11/02	CK# 170	1,850.00-	2,764.51
11/03	CK# 173	493.52-	2,270.99
11/09	CK# 168	90.00-	2,180.99
11/09	CK# 172	90.00-	2,090.99
11/09	CK# 176	90.00-	2,000.99
11/09	CK# 174	298.55-	1,702.44
11/09	CK# 175	1,596.00-	106.44
11/15	CREDIT-INTEREST	7.30	113.74
11/15	ENDING BALANCE		\$113.74

CHECK REGISTER

CHECK#	DATE	AMOUNT	CHECK#	DATE	AMOUNT
152	10/20	49.99	162*	10/24	90.00

MILLINGTON SAVINGS BANK
1902 LONG HILL ROAD
MILLINGTON, N.J. 07946

ACCOUNT SUMMARY

2035 001

WILLIAM DIETRICH
KAREN SEYMOUR

PAGE 1
STATEMENT PERIOD
FROM 10/16/00
THRU 11/15/00

CHECK REGISTER

CHECK#	DATE	AMOUNT	CHECK#	DATE	AMOUNT
163	10/25	1,500.00	170	11/02	1,850.00
164	10/24	90.00	171	11/01	4,000.67
165	10/21	2,524.00	172	11/09	90.00
166	11/01	3,177.60	173	11/03	493.52
167	10/30	500.00	174	11/09	298.55
168	11/09	90.00	175	11/09	1,596.00
169	10/30	1,380.00	176	11/09	90.00

* INDICATES NON-CONSECUTIVE CHECK NUMBER(S)

ANNUAL PERCENTAGE YIELD EARNED (APY-E)	1.91%
INTEREST EARNED THIS STATEMENT PERIOD	\$7.30

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ONLINE BANKING?

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WWW.MILLINGTONSB.COM

Morris County Surrogate's Court

Administration & Records Bldg.

Morristown, New Jersey 07963-0900

Tel # (973) 285-6500

Fax # (973) 829-8599

John Pecoraro
Surrogate

Christopher Luongo, Esq.
Deputy Surrogate



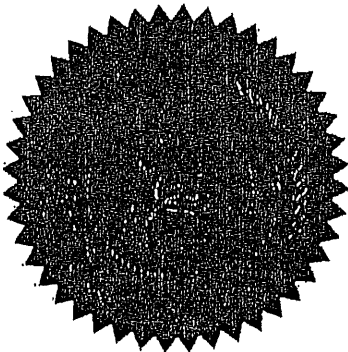
-----X
In the Matter of the Estate of
KAREN LYNN SEYMOUR, Deceased
(aka:)
SSN: 216-78-0660
-----X

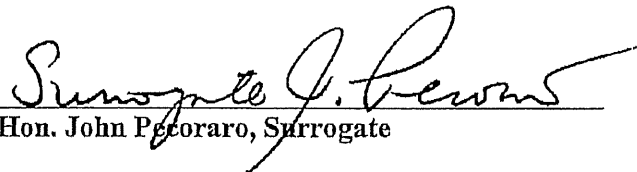
LETTERS OF
ADMINISTRATION
Docket No.: **MRS-P-2271-2001**
Date of Death: 9/11/2001

SURROGATE OF MORRIS County

I, **Hon. John Pecoraro**, Surrogate of the County of **MORRIS** do certify that on November 19th, 2001 Administration of the Goods and Chattels, Rights and Credits which were of **KAREN LYNN SEYMOUR** late of the County of **MORRIS**, who died intestate, was granted by me to **WILLIAM G. DIETRICH** who is(are) the Administrator(s) and is(are) duly authorized to administer the same agreeably to law.

WITNESS my hand and seal of office, on
November 19th, 2001.




Hon. John Pecoraro, Surrogate